

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2021
AUGUST 9, 2022 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. 3:22-cr-00087

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

18 U.S.C. § 2260A

ALEX KAI TICK CHIN

S U P E R S E D I N G
I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

From on or about December 12, 2020 through on or about January 11, 2021, at or near Huntington, Wayne County, West Virginia, and within the Southern District of West Virginia, defendant ALEX KAI TICK CHIN did employ, use, persuade, induce, entice, and coerce a minor, Minor Female 1, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and the visual depictions were transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO

From on or about December 12, 2020 through on or about January 11, 2021, at or near Huntington, Wayne County, West Virginia, and within the Southern District of West Virginia, and elsewhere, defendant ALEX KAI TICK CHIN, an individual required by Federal or other law to register as a sex offender, committed a felony offense involving a minor under Title 18, United States Code, Section 2251.

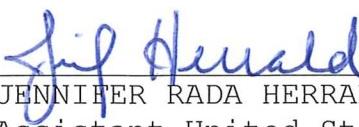
In violation of Title 18, United States Code, Section 2260A.

FORFEITURE

In accordance with Section 2253(a) of Title 18 of the United States Code, and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised on the conviction of defendant ALEX KAI TICK CHIN of a violation of 18 U.S.C. §§ 2251 et seq., as set forth in this superseding indictment, the defendant shall forfeit to the United States any visual depictions and any books, magazines, periodicals, films, videotapes, and other matter which contains such visual depictions, which were produced, transported, mailed, shipped, or received in connection with the violations set forth in this superseding indictment, any real and personal property constituting or traceable to gross profits or other proceeds obtained from the violations set forth in this superseding indictment, and any real and personal property used or intended to be used to commit or to promote the commission of the violations set forth in this superseding indictment.

WILLIAM S. THOMPSON
United States Attorney

By:



JENNIFER RADA HERRALD
Assistant United States Attorney